

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DELTA PILOTS ASSOCIATION,  
a labor organization  
incorporated in Florida  
Plaintiff

v.

JOHN DOE,  
an individual  
Defendant.

**Civil Action No.: 1:14-cv-00225-AKH**

**DECLARATION OF  
HOWARD HOLLANDER**

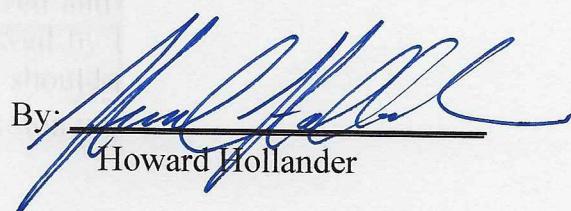
I, HOWARD HOLLANDER, do declare as follows:

1. I make this Declaration of my own free will, based on my personal, first-hand knowledge, unless otherwise specifically indicated, and would so testify under oath:
2. This Declaration is submitted in support of “Plaintiff’s Memorandum Of Law Opposing Defendant’s Motion For Summary Judgment.”
3. I am an active airline pilot currently employed by American Airlines, Inc. and have worked as a professional airline pilot for almost thirty years. During that time, I have served in several different capacities for the Air Line Pilots Association (ALPA), the largest pilot labor union in the United States, including Domicile Chairman, Domicile Vice Chairman, Master Executive Chairman, Professional Standards Committee, and, for over 20 years, on the ALPA Grievance Committee. Currently, I serve as the Grievance Chairman for the American Independent Cockpit Alliance (AICA), an independent union serving American Airlines pilots who believe that they cannot obtain adequate representation from the incumbent union. Due to my decades-long service for airline pilot unions, I am familiar with how such unions typically compensate pilots who provide their services to the union.
4. In my experience, pilots who provided services to the union during their free time, such as vacation time, would be permitted to identify a trip in their future schedule

from which they would be removed and yet receive full pay for the trip from the union. The general policy followed by both unions for which I have served was that, financially speaking, a pilot should neither be "advantaged nor disadvantage" for volunteering his/her time for union work.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 14, 2018

By:   
Howard Hollander